

**Comments on texts resulting from the Terrestrial Animal Health Code Commission Report –  
January 2005 Meeting  
Submitted by the United States of America**

## **Guidelines for the Transport of Animals by Sea**

### **General comments**

The document as proposed requires Competent Authorities to do numerous things. In Article 1, these include: 1) establishing minimum standards for animal welfare, 2) setting standards for the competence of drivers, animal handlers and managers, 3) establishing an accreditation system or interaction method to implement the standards, and 4) monitoring and evaluating the use of veterinary medications. In Article 2, these include creating an independent body, accredited by the Competent Authority, to assess compliance of animal handlers and to issue certificates of competence. The United States does not agree that the Competent Authorities in the Member Countries should be performing those functions. Perhaps the activities may be performed by other groups/organizations in cooperation with the Competent Authorities.

### **Specific comments**

#### **Article 1**

##### **Responsibilities**

##### **Current proposed text:**

Bullet 11, sub-bullet 1: Veterinarians are responsible for the humane handling and treatment of animals during the journey. The veterinarian should meet with the Master, Chief Officer, and the senior animal handler on a daily basis.

##### **Comment/Rationale:**

The proposed text specifies that the veterinarian is responsible for the humane handling and treatment of animals during the journey. The veterinarian should meet with the Master, Chief Officer, and the senior animal handler on a daily basis. However, there is no other reference in the document which states that a veterinarian is required to accompany the animals throughout the journey. Is the intent of the OIE to have a competent veterinarian accompany animals on the journey to ensure the animals are handled and treated humanely? If so, who is responsible for ensuring that a veterinarian accompanies animals on the journey?

There should be specific text in the guidelines that identifies the individuals who are responsible for ensuring that a competent veterinarian is available to ensure the animals are handled and treated humanely during the journey. For example: There is specific text within the guidelines that clearly states a competent animal handler be present to care for the animals throughout the journey. Article 1, bullet 5, sub-bullet 1, states the exporter, shipping company etc. are jointly responsible for planning the journey to ensure the care of the animals including: choosing appropriate vessels and ensuring that competent animal handlers are available for loading and caring for animals throughout the journey.

The proposed guidelines should contain specific and clearly worded text that states a competent veterinarian shall accompany the animals on the journey to ensure they are handled and treated humanely.

#### **Article 2**

##### **Competence**

##### **Suggested proposed text:**

Bullet 3: Assessment of competence for animal handlers should at a minimum address knowledge, and ability to apply that knowledge, in the following areas:

- sub-bullet 5: general disease prevention procedures, including cleaning and disinfection

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**Comment/rationale:**

An animal handler should have the basic knowledge and ability to apply that knowledge to implement techniques and appropriate principles of cleaning *and* disinfection as they apply to animal health and zoonotic public health issues.

## **Article 6**

### **Loading**

#### **Goads and other aids**

**Suggested proposed text:**

Bullet 1, sub-bullet 5:

The following principles should apply: The use of muzzled well trained dogs to help with the loading of some species may be acceptable.

**Comment/Rationale:**

If well trained dogs are required to be muzzled when they are used to load animals for land transport, as required in the proposed guidelines, then they should also be muzzled when they are used to load animals for sea transport.

## **Article 7**

### **Travel**

#### **Sick and injured animals**

**Suggested proposed text:**

Bullet 2: Sick or injured animals should be treated promptly and appropriately, and veterinary advice should be sought if necessary. All drugs and products should be used in accordance with the manufacturer's or veterinarian's recommendations.

**Comment/Rationale:**

The proposed text gives the reader the impression that veterinarians only use drugs and products according to manufacturer's recommendations to treat animals. Drugs and other products are often used by veterinarians to treat specific species of animals that are not referenced in the manufacturer's recommendations. The extra-label use of drugs and other products for the purpose of treating animals is a necessary component of professionally accepted veterinary practice.